

United States Courts  
Southern District of Texas

FILED

February 15, 2024

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

JAYLON WHITE,

Defendant

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§  
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§

CRIMINAL NO. 4:24-cr-00084

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment, Chevron is a part of an international energy corporation headquartered in San Ramon, California, with locations throughout the United States and abroad. Additionally, currency and goods related to this business are shipped in interstate commerce and affect interstate commerce.

At all times material to this Indictment, Shell is a part of an international oil and gas company headquartered in London, England, the United Kingdom, with locations throughout the United States and abroad. Additionally, currency and goods related to this business are shipped in interstate commerce and affect interstate commerce.

At all times material to this Indictment, Walgreens is a part of an international pharmacy chain headquartered in Deerfield, Illinois, with locations throughout the United States and abroad. Additionally, currency and goods related to this business are shipped in interstate commerce and affect interstate commerce.

COUNT ONE

Title 18, United States Code, § 1951(a) and 2  
Aiding and Abetting Interference with Commerce by Robbery

On or about September 19, 2023, in the Houston Division of the Southern District of Texas,

**JAYLON WHITE**

aiding and abetting others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of **Chevron, located at 5418 Telephone Road, Houston, TX 77087**, which was in the possession and custody of an employee of Chevron, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items, in violation of Title 18, United States Code, § 1951(a) and 2.

**COUNT TWO**

Title 18, United States Code, § 1951(a)  
Aiding and Abetting Interference with Commerce by Robbery

On or about September 9, 2023, in the Houston Division of the Southern District of Texas,

**JAYLON WHITE**

aiding and abetting others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of **Shell, 5601 Memorial Drive, Houston, Texas 77007**, which was in the possession and custody of an employee of Shell, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items, in violation of Title 18, United States Code, § 1951(a) and 2.

**COUNT THREE**

Title 18, United States Code, § 1951(a)  
Aiding and Abetting Interference with Commerce by Robbery

On or about September 3, 2023, in the Houston Division of the Southern District of Texas,

**JAYLON WHITE**

aiding and abetting others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of **Walgreens, 5202 Almeda Road, Houston, Texas 77004**, which was in the possession and custody of an employee of Walgreens, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items, in violation of Title 18, United States Code, § 1951(a) and 2.

**COUNT FOUR**

Title 18, United States Code, § 924(c)(1)(A) and 2  
Aiding and AbettingUsing and Carrying a Firearm during and in  
Relation to a Crime of Violence

On or about September 19, 2023, in the Houston Division of the Southern District of Texas,

**JAYLON WHITE**

aiding and abetting others known and unknown to the Grand Jury, did knowingly carry, and brandish a firearm, namely, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that being **Interference with Commerce by Robbery**, in violation of Title 18, United States Code, § 924(c)(1)(A)(ii) and 2.

**COUNT FIVE**

Title 18, United States Code, § 924(c)(1)(A) and 2  
Aiding and AbettingUsing and Carrying a Firearm during and in  
Relation to a Crime of Violence

On or about September 9, 2023, in the Houston Division of the Southern District of Texas,

**JAYLON WHITE**

aiding and abetting others known and unknown to the Grand Jury, did knowingly carry, and brandish a firearm, namely, a rifle, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that being **Interference with Commerce by Robbery**, in violation of Title 18, United States Code, § 924(c)(1)(A)(ii) and 2.

**COUNT SIX**

Title 18, United States Code, §§ 924(c)(1)(A) and 2  
Aiding and AbettingUsing and Carrying a Firearm during and in  
Relation to a Crime of Violence

On or about September 3, 2023, in the Houston Division of the Southern District of Texas,

**JAYLON WHITE**

aiding and abetting others known and unknown to the Grand Jury, did knowingly carry, and brandish a firearm, namely, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that being **Interference with Commerce by Robbery**, in violation of Title 18, United States Code, § 924(c)(1)(A)(ii) and 2.

A TRUE BILL:

**Original Signature on File**  
FOREMAN OF THE GRAND JURY

ALAMDAR S. HAMDANI  
United States Attorney

BY:

  
Francisco J. Rodriguez  
Assistant United States Attorney